

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

STATE OF LOUISIANA *et al.*,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF EDUCATION *et al.*,

*Defendants.*

No. 24-cv-563

RAPIDES PARISH SCHOOL BOARD,

*Plaintiff,*

v.

U.S. DEPARTMENT OF EDUCATION *et al.*,

*Defendants.*

No. 24-cv-567

**DEFENDANTS' MOTION FOR A PARTIAL STAY PENDING APPEAL**

Defendants respectfully move this Court for a partial stay of this Court's June 13, 2024, Memorandum Ruling, ECF No. 53, pending appeal to the United States Court of Appeals for the Fifth Circuit. The basis for Defendants' motion is set forth in the attached Memorandum. A proposed order is also attached. Undersigned counsel for Defendants has conferred with counsel for Plaintiffs, who indicated that Plaintiffs in each case oppose Defendants' motion.

Dated: June 24, 2024

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

EMILY B. NESTLER  
Assistant Branch Director

*/s/ Pardis Gheibi*

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**CERTIFICATE OF CONFERENCE**

I certify that on June 21, 2024, I conferred via e-mail with counsel for Plaintiffs in the above-captioned cases about this motion. By email on June 21, 2024, Louisiana Solicitor General J. Benjamin Aguiñaga and Natalie Thompson, Senior Counsel, Alliance Defending Freedom, informed me via email that Plaintiffs in each case oppose the relief sought. Specifically, Mr. Aguiñaga stated, “Plaintiffs in No. 24-cv-563 oppose the motion you describe.” Ms. Thompson stated “Rapides Parish School Board is also opposed.”

/s/ Pardis Gheibi

**CERTIFICATE OF SERVICE**

I certify that on June 24, 2024, the above document was filed with the CM/ECF filing system.

/s/ Pardis Gheibi